



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 9, 2021

BY ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

Re: United States v. Laforest et al., 21 Cr. 272 (CM)

Dear Judge McMahon:

The parties respectfully submit this letter to jointly request a modification to the bond for Tatiana Laforest. Ms. Laforest's bond requires that she post \$100,000 collateral to secure the bond. The parties have understood that to mean, like her codefendants, Ms. Laforest could post cash or property to secure the bond. *See* ECF No. 9 (minute entry noting bond "[s]ecured by \$100,000 cash/property"). Ms. Laforest's counsel has been diligently working to obtain the necessary documents to use real property as collateral. However, the parties just realized that, unlike her codefendants' bonds, Ms. Laforest's actual bond states that she must post cash as collateral; the bond does not allow her to post property. Accordingly, the parties jointly request that the Court so order a modification to the defendant's bond so that that Ms. Laforest can post \$100,000 in either cash or property to satisfy the secured portion of her bond.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: /s/ Matthew R. Shahabian
Matthew R. Shahabian
Assistant United States Attorney
(212) 637-1046

CC: Counsel of Record (by ECF)

MEMO ENDORSED
6/22/21

So Ordered

Colleen M. McMahon

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